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EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

January 31, 1991

RPD-91.1

William S. Turner
Woodward-Clyde Federal Services
Stanford Place 3, Suite 612
4582 South Ulster Street Parkway
Denver, Colorado 80237

INITIAL COMMENTS IN THE RFI/RI WORK PLAN FOR OU-5 AND OU-6

The following are my initial general comments on the RFI/RI Work Plan for OU-5 (Woman Creek) and OU-6 (Walnut Creek). Please assure that these are incorporated into or responded to before issuance of the next draft.

- a. A conceptual model based on risk assessment shall be included in the DQO section of the RFI/RI Work Plan. The contents of this conceptual model will be based on information from EPA's "Guidance for Data Useability in Risk Assessment" and EPA's "Risk Assessment Guidance for Superfund." Delete Section 2.10, "Conceptual Model." The conceptual model based on risk assessment shall contain the following five categories:

- Primary Source
- Primary Release Mechanism
- Secondary Source
- Secondary Release Mechanism
- Exposure Route

Sampling requirements will be traceable to the conceptual model based on the risk assessment.

- b. Examine the RFI/RI Work Plan with respect to the requirements of EPA's "Guidance for Data Useability in Risk Assessment" document. The requirements in this manual shall be met. How these requirements are met shall be outlined.

Sampling rational shall be traceable to the requirements and how they are met.

- c. When quoting contaminant concentrations in Section 2.0, add background concentrations of the contaminant for reference.

CLASSIFICATION:

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CONFIDENTIAL	<input checked="" type="checkbox"/>
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- d. On Page 4-2, the reference to the "Superfund Public Health Evaluation Manual" shall be deleted. This is an out-of-date document.
- e. On Page 4-4, the reference to the NCP and risk is wrong. Please call me for clarification.
- f. In Table 5-1, why aren't we looking at the vertical extent of contamination at the sludge disposal area (OU-6)? There may be IHSSs in OU-5 that need to be looked at, including vertical extent.
- g. Why isn't the current demographics study used in chapter one?
- h. Why aren't pesticides or PCBs being analyzed for at OU-6? They are known to exist at sites in OU-6.

If you have any questions or comments, please contact me at 966-3198.


J. T. Ottensman
Program Manager
EG&G Rocky Flats, Inc.

JTO:plf

Attachments:
As Stated

cc:
T. C. Greengard